District Judge Marsha J. Pechman

2

1

3

4

5 6

7

8

9

10

11

12 13

14

15 16

17

18

19

20

21

22

23 24

25

26 27

28

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GERARDO SUSANO ANDRADE,

Plaintiff,

v.

KENNETH T. CUCCINELLI, et al.,

Defendants.

NO. 2:20-cv-00692-MJP

Stipulated Motion to Extend Deadlines

Note on Motion Calendar: September 11, 2020

The parties, pursuant to Local Rules 10(g), hereby jointly stipulate and move for a one month extension of their initial scheduling deadlines. Dkt. No. 9. The parties submit there is good cause for an extension of these deadlines. The response to the complaint is currently due on October 5, 2020. This extension will allow Defendants to respond to the complaint before engaging in discussions about discovery. The parties also intend to discuss potential resolution of this matter that may avoid the need for further judicial intervention. The current and proposed deadlines are as follows:

Deadline	<b>Current Date</b>	Proposed Date
FRCP 26(f) Conference	September 11, 2020	October 9, 2020
Initial Disclosures	September 18, 2020	October 16, 2020
Joint Status Report and Discovery Plan	October 5, 2020	November 2, 2020

## 

1	A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing		
2	pretrial and trial dates is within the discretion of the trial judge. See King v. State of California,		
3	784 F.2d 910, 912 (9th Cir. 1986). Accordingly, the parties seek a one month extension of their		
4	initial scheduling deadlines. Dkt. No. 9.		
5	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.		
6	,		
7	DATED: September 11, 2020	<u>s/ Alexandra Lozano</u> ALEXANDRA LOZANO, WSBA #40478	
8		Alexandra Lozano Immigration Law	
9		16400 Southcenter Pkwy., Suite 410 Tukwila, WA 98188	
10		Phone: 206-406-3068	
11		Fax: 206-494-7775 Email: Alexandra@abogadaalexandra.com	
12		_	
13		Attorney for Plaintiff	
14	DATED: September 11, 2020	s/ Michelle R. Lambert MICHELLE LAMBERT, NYS #4666657	
15		Assistant United States Attorney United States Attorney's Office	
16		1201 Pacific Ave, Suite 700 Tacoma, WA 98402	
17		Phone: (253) 428-3824	
18		Email: michelle.lambert@usdoj.gov	
19		Attorney for Defendants	
20			
21			
22			
23			
24			
25			
26			
27			
28	STIPULATED MOTION TO EXTEND DEADLINES 2:20-cv-692-MJP		

PAGE-2

<u>ORDER</u> IT IS SO ORDERED. Dated this 11th day of September, 2020. Marshy Relens Marsha J. Pechman United States Senior District Judge